



Minnesota Pollution Control Agency

520 Lafayette Road, Saint Paul, Minnesota 55155-3898

Telephone (612) 296-6300

US EPA RECORDS CENTER REGION 5



469774

April 4, 1991

Mr. Peter Sabee
Barr Engineering
7803 Glenroy Road
Minneapolis, Minnesota 55439-3123

Dear Mr. Sabee:

RE: Magnolia Aquifer Testing Plan

Enclosed are the Minnesota Pollution Control Agency (MPCA) staff's comments on the draft Magnolia Aquifer Testing Work Plan for the General Mills site at 2010 East Hennepin Avenue. The draft work plan will satisfy the MPCA's needs with minor modifications.

Please excuse some of our picky comments. We felt that as long as we were going to have you make some changes in the document, we might as well be very thorough in our review.

If you have any questions, please contact me at (612) 296-7776 or Fred Campbell at (612) 297-1799.

Sincerely,

Mark D.C. Schmitt, Ph.D.
Project Manager
Responsible Party Unit I
Site Response Section
Ground Water and Solid Waste Division

MDCS:pk

Enclosure

cc: Tom Alcamo, U.S. Environmental Protection Agency, Region V

COMMENTS

Page 1
Second Paragraph and elsewhere

The term "data" is a plural rather than a singular term. The grammar in this paragraph, and elsewhere in the document where the term appears, needs to be changed accordingly.

Page 1
Second Paragraph and elsewhere

The term "member" should be capitalized, since it represents a formal geologic unit.

Page 1
Third Paragraph
First Line

"have indicates" should be changed to "indicate".

Page 1
Third Paragraph

The degree of separation you say has been observed between the Carimona and Magnolia Members should be better quantified, if possible. MPCA files do not show any separation between these Members at the nearby MGK site.

Page 2
First Paragraph

The MPCA acknowledges that some of the Magnolia contamination originates off-site. However, given the limited (1) number of downgradient Magnolia wells, we feel your statement that the primary source of contamination originates off-site is premature. Please note the limited Magnolia downgradient well network and qualify this statement accordingly.

Page 2
Second Paragraph
Last Sentence

This sentence tells only half the story. TCE levels in some Carimona wells have remained static, while others have actually increased. We would feel more comfortable if you said, "The effectiveness of pump out well 108 in remediating Carimona ground water quality is demonstrated by the results from monitoring wells BB, WW, 8, and 10, which indicate significant reductions in TCE concentrations since implementation of the remedial system."

Page 3
Second Paragraph
Second last line

The term "locations" is split.

Page 4

First Paragraph

Please provide a pumping rate for the Carimona pump test. Will it be consistent with the current pumping rate (15-18 gpm), or will another rate be used?

Page 5

Last Paragraph

We are a bit confused here. Will the Magnolia pump test begin after after Well 108 has been shut off and all water levels have reached steady state conditions, or after all water levels have reached steady state conditions with well 108 pumping?